

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TALECRIS BIOTHERAPEUTICS, INC., and)
BAYER HEALTHCARE LLC,)

Plaintiffs,)

v.)

BAXTER INTERNATIONAL INC., and)
BAXTER HEALTHCARE CORPORATION,)

Defendants.)

C.A. No. 05-349-GMS

Jury Trial Demanded

BAXTER HEALTHCARE CORPORATION,)
Counterclaimant,)

v.)

TALECRIS BIOTHERAPEUTICS, INC., and)
BAYER HEALTHCARE LLC,)

Counterdefendants.)

PLAINTIFFS' NOTICE OF DEPOSITION OF PETRA AXMANN

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that beginning on August 28, 2006 at 9:30 a.m., at the Hotel Imperial, Kaerntner Ring 16, Vienna 1015, Austria, counsel for Plaintiffs Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC will take, pursuant to Federal Rules of Civil Procedure 28 and 30, the deposition upon oral examination of Petra Axmann.

The deposition will be taken before an officer authorized to administer oaths and will continue from hour to hour and day to day until completed. You are invited to attend and cross-examine.

Please be advised that this deposition may be recorded by videotape in addition to stenographic recording, which will include the use of LiveNote real time transcription.

Date: August 15, 2006

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Jeffrey B. Bove

Jeffrey B. Bove (#998)

Mary W. Bourke (#2356)

Mark E. Freeman (#4257)

Jaclyn M. Mason (#4737)

The Nemours Building

1007 North Orange Street

Wilmington, DE 19801

(302) 658-9141

*Attorneys for Talecris Biotherapeutics, Inc.
and Bayer Healthcare LLC*

Bradford J. Badke

Gabrielle Ciuffreda

ROPES & GRAY LLP

1251 Avenue of the Americas

New York, NY 10020-1105

(212) 596-9000

Attorneys for Bayer Healthcare LLC

CERTIFICATE OF SERVICE

I, JEFFREY B. BOVE, do hereby certify that I caused a true copy of the foregoing document, **PLAINTIFFS' NOTICE OF DEPOSITION OF PETRA AXMANN**, to be served upon the below listed in the manner indicated on August 15, 2006.

Via Hand Delivery and E-Mail

Philip A. Rovner, Esquire
Potter Anderson & Corroon LLP
Hercules Plaza
P. O. Box 951
Wilmington, DE 19899
(302) 984-6140

Via Federal Express and E-Mail

Susan Spaeth, Esquire
Townsend and Townsend and Crew LLP
379 Lytton Avenue
Palo Alto, CA 94301-1431
(415) 576-0200

By: /s/ Jeffrey B. Bove
Jeffrey B. Bove (# 998)